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May 29, 2019

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

BY ECF

Re: 19-cv-00113-PAE – *Flatt v. Doe* – Joint Letter Motion for a Stay

Dear Judge Engelmayer,

Plaintiff Gordon Flatt and Defendant John Doe jointly request an order staying this litigation to allow the parties to engage in settlement discussions before Plaintiff files an Amended Complaint naming Defendant and effects service. The parties propose filing a joint status letter 90 days after entry of the requested stay to set a further schedule if necessary.

On March 28, 2019, the Court granted Plaintiff's First Motion for an Extension of Time to Serve Defendant so that Plaintiff could complete third-party discovery from an Internet Service Provider. Dkts. 12-13. Plaintiff has now completed all pre-Rule 26(f) Conference discovery and has conferred with Defendant through their respective counsel. The parties agree that settlement discussions are warranted in an effort to resolve disputes between the parties without need for further litigation. The parties further agree that these discussions are more likely to be productive before Plaintiff files an Amended Complaint and serves Defendant. Accordingly, the parties respectfully request that the Court enter a stay.

Respectfully submitted,

/s/ Ryan Blanch
Ryan Blanch

Counsel for Defendant

/s/ Justin V. Shur
Justin V. Shur
Jordan A. Rice

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of May, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties with an e-mail address of record who have appeared and consent to electronic service in this action.

Dated: May 29, 2019

/s/ Justin V. Shur

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